UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOANNA VARGAS, AS EXECUTRIX :

OF THE ESTATE OF JUSTINO : CIVIL ACTION

VARGAS, AND IN HER OWN :

RIGHT : NO. 1:16:CV-01657-YK

PLAINTIFF, :

JURY TRIAL DEMANDED

PENN STATE HERSHEY MILTON S. HERSHEY MEDICAL CENTER

v.

DEFENDANT.:

PLAINTIFF'S PROPOSED SPECIAL VERDICT QUESTIONS

Respectfully submitted,

THE BEASLEY FIRM, LLC

Date: 25 May 2018 By: /s/James E. Beasley, Jr.

JAMES E. BEASLEY, JR. Attorney for Plaintiff

Question 1:

Do you find that Defendant, Penn State Milton S. Hershey Medical Center,
through any of its healthcare providers involved in Justino Vargas'
treatment were negligent?
YesNo
If you answered "Yes," proceed to Question 2. If you answer Question 1 "No,"
then plaintiff cannot recover and you should not answer any further questions. Please
inform the court officer.
Question 2:
Was the negligence identified in your response to question 1 a factual cause
of the injuries to and death of Justino Vargas?
YesNo
If you answered "Yes," proceed to Question 3. If you answer Question 2 "No," the
plaintiffs cannot recover and you should not answer any further questions. Please
inform the court officer.
Question 3:
Write the amount of Wrongful Death damages.
s
Write the amount of Survival Act damages.

Question 4:
Did the conduct of Penn State Milton S. Hershey Medical Center, through
any of its healthcare providers involved in Justino Vargas' treatment, cause
Joanna Vargas' physical manifestations and emotional distress?
YesNo
If you answered "Yes", please state the damages you award to Joanna Vargas for such negligent infliction of emotional distress: S
FOREPERSON
Date: